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17 [Additional counsel appear on signature page.]

18 UNITED STATES DISTRICT COURT  
19 NORTHERN DISTRICT OF CALIFORNIA  
20 SAN JOSE DIVISION

21 In re CISCO SYSTEMS, INC. SECURITIES )  
LITIGATION )

Master File No. C-01-20418-JW(PVT)

22 \_\_\_\_\_ )

CLASS ACTION

23 This Document Relates To: )

STIPULATION AND [PROPOSED] ORDER  
REGARDING PRETRIAL SCHEDULE

24 ALL ACTIONS. )

25 \_\_\_\_\_ )

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1 WHEREAS, the July 2, 2003 Amended Scheduling Order provides for a pretrial schedule as  
2 follows:

3	Plaintiffs' Expert Reports Due	July 29, 2005
4	Defendants' Expert Reports Due	July 29, 2005
5	Plaintiffs' Rebuttal Reports Due	August 8, 2005
6	Defendants' Rebuttal Reports Due	August 8, 2005
7	Objections to Experts Due	September 12, 2005
8	Fact Discovery Cut-Off	September 30, 2005
9	Expert Discovery Cut-Off	September 30, 2005
10	Pretrial Motions Due	January 24, 2006
11	Pretrial Motion Hearing	February 27, 2006
12	Pretrial Conference	April 24, 2006
13	Joint Pretrial Statement Due	May 12, 2006
14	Motions in <i>Limine</i> Due	June 2, 2006
15	Final Pretrial Conference	June 12, 2006
16	Trial	June 27, 2006

17 WHEREAS, the parties have engaged in substantial fact discovery to date, including written  
18 discovery, document production and depositions;

19 WHEREAS, the parties anticipate completing all fact discovery by September 30, 2005;

20 WHEREAS, the parties believe it would be more efficient to conduct expert discovery after  
21 fact discovery is concluded;

22 WHEREAS, the parties have been unable to agree on the proper sequencing of the disclosure  
23 of experts and expert reports. The parties intend to submit to the Court alternative proposed orders  
24 on this issue accompanied by a brief supporting memorandum from each party;

25 THEREFORE, the parties, through their counsel of record, hereby stipulate to the following  
26 pretrial schedule which does not alter the existing fact discovery cut-off:  
27  
28

1	Fact Discovery Cut-Off	September 30, 2005
2	Plaintiffs' Expert Reports Due	TBD
3	Defendants' Expert Reports Due	TBD
4	Rebuttal Reports Due	TBD
5	Expert Discovery Cut-Off	February 24, 2006
6	Dispositive Motions Filed	March 6, 2006
7	Oppositions to Dispositive Motions Filed	April 24, 2006
8	Replies to Dispositive Motions Filed	May 22, 2006
9	Hearing on Dispositive Motions	June 9, 2006
10	Objection to Experts Due	June 30, 2006
11	Pretrial Conference	July 14, 2006
12	Joint Pretrial Statement Due	August 14, 2006
13	Motions in <i>Limine</i> Due	September 8, 2006
14	Final Pretrial Conference	September 18, 2006
15	Trial	September 29, 2006

16 IT IS SO STIPULATED.

17 DATED: April 4, 2005

18 LERACH COUGHLIN STOIA GELLER  
 19 RUDMAN & ROBBINS LLP  
 20 WILLIAM S. LERACH  
 21 SPENCER A. BURKHOLZ  
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23 /s/ Daniel S. Drosman  
 24 DANIEL S. DROSMAN

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27 Co-Lead Counsel for Plaintiffs

1 I, Daniel S. Drosman, am the ECF User whose ID and password are being used to file this  
2 Stipulation and [Proposed] Order Regarding Pretrial Schedule in compliance with General Order  
45, X.B., I hereby attest that Carol Lynn Thompson has concurred in this filing.

3 DATED: April 4, 2005

HELLER EHRMAN WHITE & MCAULIFFE LLP  
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5  
6 /s/ Carol Lynn Thompson  
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Counsel for PricewaterhouseCoopers LLP

10 I, Daniel S. Drosman, am the ECF User whose ID and password are being used to file  
11 this Stipulation and [Proposed] Order Regarding Pretrial Schedule in compliance with General  
12 Order 45, X.B., I hereby attest that Robert Y. Sperling has concurred in this filing.

13 DATED: April 4, 2005

WINSTON & STRAWN LLP  
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14  
15 /s/ Robert Y. Sperling  
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19 Counsel for the Cisco Defendants

20 \* \* \*

21 **ORDER**

22 PURSUANT TO STIPULATION, IT IS SO ORDERED.

23  
24 DATED: \_\_\_\_\_

\_\_\_\_\_  
25 THE HONORABLE JAMES WARE  
26 UNITED STATES DISTRICT JUDGE  
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DECLARATION OF SERVICE

I hereby certify that on April 4, 2005, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the attorneys denoted on the attached Service List. I hereby certify that I have caused this document to be mailed by the United States Postal Service and/or faxed to the non-CM/ECF participants listed on the attached Service List.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 4th day of April, 2005, at San Diego, California.

\_\_\_\_\_  
s/Daniel S. Drosman  
DANIEL S. DROSMAN

CISCO (FEDERAL-LEAD)

Service List - 4/4/2005 (201-110-1)

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CISCO (FEDERAL-LEAD)

Service List - 4/4/2005 (201-110-1)

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